

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Boston Edison Company,
d/b/a NSTAR Electric

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D.T.E. 04-113

ATTORNEY GENERAL'S SECOND SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's SECOND SET of DISCOVERY in the above referenced docket.

- AG-2-1 Please provide a chart showing (1) all transmission and scheduling, system control and dispatch costs and expenses for 2004 by FERC account number (detailed to the lowest level of sub account number maintained by the Company) and (2) the specific transmission tariff, schedule and attachment under which each cost and expense is recoverable. Include a full description of each tariff, schedule and attachment. The response must separately identify Boston Edison SCADA costs recovered through the 2004 tariff equivalent to ISO tariff Schedule 1, Appendix A (FERC Electric Tariff No. 3, Open Access Transmission Tariff, Section II--Schedule 1, Appendix A). Please identify the lines on Exhibit BEC-CLV-3(Supp.), p. 1 that include each of these costs. Specify the amount that is included on each line.
- AG-2-2 Please provide a chart showing (1) all transmission and scheduling, system control and dispatch costs and expenses for the years 1998-2003 by FERC account number (detailed to the lowest level of sub account number maintained by the Companies) and (2) the specific transmission tariff, schedule and attachment under which each cost and expense is recoverable. Include a full description of each tariff, schedule and attachment. The response must separately identify Boston Edison SCADA costs recovered through the 1998-2003 tariff equivalents to ISO tariff Schedule 1, Appendix A (FERC Electric Tariff No. 3, Open Access Transmission Tariff, Section II--Schedule 1, Appendix A). Please identify the lines or columns that appeared in the Companies' annual retail transmission cost reconciliation schedules (the equivalent to the 2004 Exhibit BEC-CLV-3(Supp.), p. 1 that include each of these costs. Specify the amount that is included on each line/column.
- AG-2-3 Please provide detailed schedules (monthly sub-account balances, supporting monthly invoices, etc.) supporting each line appearing in Exhibit BEC-CLV-3

(Supp.). Explain each adjustment in excess of \$5,000.

- AG-2-4 Refer to Exhibit BEC-CLV-3(Supp.), p.1. Are any of the costs included in line 11(Retail Schedule & Dispatch Cost) of the exhibits, also included in the amount shown on line 1 (Monthly Transmission Revenue Requirement (OATT)) of the exhibits? If yes, please provide such amounts for the years 1998-2004. If no, was this true in 2003 based on Exhibit BEC-JFL-3 (Supp), p. 2, filed in DTE 03-117? If it was true in 2003, please provide the amount of such costs for the years 1998-2003.
- AG-2-5 Refer to Exhibit BEC-CLV-3(Supp.), p. 1. Are any of the costs included in line 11(Retail Schedule & Dispatch Cost) of the exhibits, also included in the amount shown on line 8 (Retail OATT Sch. 1 SCADA Revenue Requirement) of the exhibits? If yes, please provide such amounts for the years 1998-2004. If no, was this true in 2003 based on Exhibit BEC-JFL-3 (Supp), p. 2, filed in DTE 03-117? If it was true in 2003, please provide the amount of such costs for the years 1998-2003.
- AG-2-6 Refer to Exhibit BEC-CLV-3(Supp.), p. 1. Are any of the costs included in lines 1 (Monthly Transmission Revenue Requirement (OATT), 8 (Retail OATT Sch. 1 SCADA Revenue Requirement) and 11(Retail Schedule & Dispatch Cost) of the exhibits, also included in the amount shown on line 14 (Load Dispatching (REMVEC))of the exhibits? If yes, please provide such amounts for the years 1998-2004. If no, was this true in 2003 based on Exhibit BEC-JFL-3 (Supp), p. 2, filed in DTE 03-117? If it was true in 2003, please provide the amount of such costs for the years 1998-2003.
- AG-2-7 Prior to the revising the Retail Transmission Cost Schedule, Exhibit BEC-CLV-3, under which categories of costs did the Company include line 14 costs, Load Dispatching (REMVEC)? Please explain why the Company decided to segregate this cost and show it separately. Is this consistent with the equivalent Cambridge and Commonwealth Schedules? If not, explain the basis for the differences.
- AG-2-8 Refer to Exhibit BEC-CLV-3(Supp.), p. 1. Please provide copies of the FERC approved transmission tariffs in effect during 2004. Annotate each tariff to show the provisions that govern the recovery of costs that appear on each line of Exhibit BEC-CLV-3(Supp.). If the tariffs have been changed or replaced since 2004, provide the new tariffs with similar annotations.
- AG-2-9 Refer to Exhibit BEC-CLV-3(Supp.), p.1, line 15. Please explain the difference between the supplement schedule amount for "OATT Prior Year True-Up" and the original schedule filed December 7, 2004. Why did the "actual" amounts change? Please provide copies of the documents supporting the final true-up.
- AG-2-10 Refer to Exhibit BEC-CLV-3(Supp.), p. 1. Please provide the breakdown of the

costs included in line 12, Retail Congestion Management Costs. The breakdown should show by category of congestion--for example, RMR (by contract), SCR and zonal congestion prices. Quantify the Company's FTR/ARR benefits and explain how the Company used the benefits.

- AG-2-11 Refer to Exhibit BEC-CLV-3(Supp.), p. 1, line 2. What year's costs are the RNS Revenues Received from NEPOOL based on? If not a calendar year, identify the year end date. Are the revenues received different from the revenues billed? If yes, why and why doesn't the Company use the billed revenues?
- AG-2-12 Refer to Exhibit BEC-CLV-3(Supp.), p. 1, line 1. What year's costs are the Monthly Transmission Revenue Requirements (OATT) based on? If not a calendar year, identify the year end date.
- AG-2-13 Refer to Exhibit BEC-CLV-3(Supp.), p. 1, line 9. What year's costs are the Retail OATT Sch. 1 Revenues Received based on? If not a calendar year, identify the year end date. Are the revenues received different from the revenues billed? If yes, why and why doesn't the Company use the billed revenues?
- AG-2-14 Refer to Exhibit BEC-CLV-3(Supp.), p. 1, line 8. What year's costs are the Retail OATT Sch. 1 Revenue Requirements based on? If not a calendar year, identify the year end date.
- AG-2-15 Refer to Exhibit BEC-CLV-3(Supp.), p. 1, line 9. What year's costs are the Retail RNS Costs based on? If not a calendar year, identify the year end date.
- AG-2-16 Refer to Exhibit BEC-CLV-3(Supp.), p. 1, line 11. What year's costs are the Retail Schedule & Dispatch Costs based on? If not a calendar year, identify the year end date.
- AG-2-17 Refer to Exhibit BEC-CLV-3(Supp.), p. 1, line 14. What year's costs are the Load Dispatching (REMVEC) costs based on? If not a calendar year, identify the year end date. If these costs are billed directly to the Company, please provide copies of the bills for the costs included.
- AG-2-18 Please provide copies of all Default Service bills for 2004 annotated to indicate the date and amount paid. Include a summary of each month's invoiced amount that totals to the amount appearing on Exhibit BEC-CLV-5 (Supp.). Include a schedule showing the monthly amounts by customer class and pricing zone with the associated billed quantities. If the billed quantities are different than the quantities sold to the Companies' customers, please provide the corresponding monthly customer sales by class.
- AG-2-19 Please provide, for each Company, the complete details supporting the default service deferral balances at December 31, 2004. The details should include the

monthly differences between revenues and expenses by customer accounts. Explain adjustments in excess of \$5,000. Include the supporting monthly kWh for purchases and sales.

AG-2-20 Refer to Exhibit BEC-HCL-3, page 11A. Please provide a working version of all spreadsheets supporting this schedule. The spreadsheets should have all formulas in tact.

Dated: April 29, 2005